UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 7, 2014

Ms. Nancy C. Gleason
U.S. Army Corps of Engineers
CENWS-EN-ER
P.O. Box 3755
Seattle, Washington 98124

Re: Skokomish River Basin Ecosystem Restoration Draft Integrated Feasibility Report and Environmental Impact Statement – EPA Region 10 Project Number 10-056-COE

Dear Ms. Gleason:

The U.S. Environmental Protection Agency has reviewed the Skokomish River Basin Ecosystem Restoration Draft Integrated Feasibility Report and Environmental Impact Statement (DEIS). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate this opportunity to review the proposed restoration plans.

In order to address significant degradation of natural processes that sustain ecological functions of the watershed, the Corps of Engineers proposes to take actions that restore aquatic ecosystem processes, structure, and function in the lower 11 river miles of the Skokomish River Basin. The Corps conducted a General Investigation and Feasibility Study which revealed the need for and potential solutions to providing year-round fish passage around the confluence of the North and South Forks, reconnecting and restoring side channel and tributary networks, improving riparian and floodplain habitats, and improving pool depth and frequency.

In addition to the No Action Alternative, five action alternatives are proposed. Three of these (Alternatives 7, 23, and 28) stem from the base action of removing the car body levee on the north side of the mainstem; two (Alternatives 45 and 60) stem from the base action of riverbed excavation or dredging. Both base actions would include limited placement of large woody debris (LWD). These alternatives were developed through a cost-effectiveness/incremental cost analysis (CE/ICA), whereby the Corps included a progressive number and array of restoration actions or increments within the Basin to meet the purpose and need. The Tentatively Selected Plan, also known as the Preferred Alternative, is Alternative 27, which is the same as Alternative 28 but without the Dips Road Setback increment.

We are rating the Draft EIS and its Preferred Alternative 27 as LO, Lack of Objections. An explanation of the EPA rating system is enclosed for your use. We support the Corps' efforts to restore ecosystem process, structure, and function in the lower Skokomish River Basin and appreciate that the Skokomish Tribe, resource agencies, and Mason County have been involved in the watershed studies and the generation of alternatives. To ensure that intended outcomes are achieved, we recommend that the Preferred Alternative be selected, implemented, and subsequently monitored, evaluated and, where necessary, modified, with continued hands-on involvement of these same partners.

We agree, as stated in the DEIS, that the broad-scale alteration of the river bottom that would result from the Riverbed Excavation Alternatives 45 and 60 would cause significant risk to salmon habitat, and we do not support their selection. We do support the full range of actions and increments included in Alternative 28, and encourage project partners to seek alternative funding sources to implement the Dips Road Setback as well as the other proposed increments contained in Alternative 27.

In the enclosure, we offer additional comments and recommendations for your consideration in preparing the Final EIS. We thank you for the opportunity to review the Skokomish River Basin Draft Feasibility Report and Ecosystem Restoration EIS, and look forward to successful implementation. If you would like to discuss these comments or need more information, please contact me at 206-553-1601 or via electronic mail at reichgott.christine@epa.gov, or Elaine Somers of my staff at 206-553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

U.S. Environmental Protection Agency
Detailed Comments for the
Skokomish River Basin Draft Integrated Feasibility Report and EIS

Upper Watershed Characterization – current condition and trend
While problems, opportunities, and objectives for restoration are examined within the context of the entire watershed, the focus of the proposed project is within the lower 11 miles of the watershed. The Draft EIS discusses the activities that have led to degradation within the Skokomish River Basin, including those that have affected the upper South Fork Skokomish, but provides little information regarding the restoration actions that have occurred in the upper watershed. It would be helpful to include more information regarding the historic and current restoration efforts upstream of the project area, because the condition of the upper watershed has bearing on the success of efforts downstream.

Recommendation: In the Affected Environment and Environmental Consequences sections of the EIS, include more information regarding the nature and location of historic and current restoration actions in the upper South Fork Skokomish and the resulting ecological conditions and trends that would contribute to the relative success of the proposed actions.

Water Quality
Adequate water quality and appropriate water temperatures are among the basic requirements for anadromous fish in the system (p. 73). Water quality problems noted in the project area include warm temperatures, low dissolved oxygen, and high levels of bacteria and nutrients. These factors also contribute to low oxygen conditions in Hood Canal. The location and design of restoration actions can contribute to reducing these water quality problems in the project area and estuary.

Recommendation: As project design is refined, locate and design restoration actions, such as levee setbacks and riparian plantings, to reduce pollutant inputs and improve water quality within the project area and downstream estuary to the maximum possible extent.

Large Woody Debris
The Draft EIS (p. 22) states that the general goal is to use 64 logs per river mile that are two to three feet in diameter and 15 to 30 feet long for constructing engineered log jams (ELJs). Because these are large logs, it is important to ensure that restoration actions in the project area do not result in loss of important late old structure trees/stands elsewhere with associated ecological impacts.

Recommendation: Be mindful of the origin and associated impacts of obtaining large logs for the ELJs. To minimize impacts, consider sourcing logs that are certified by the Forest Stewardship Council, or that are obtained from federal lands administered under the Northwest Forest Plan. Tree root wads, where obtainable, are also valuable in ELJs.

Hazardous, Toxic Waste
While Corps policy regarding Hazardous, Toxic, and Radioactive Waste sites allows consideration of alternative project plans that avoid HTRW sites (Appendix 1, p. 1), we wish to convey that we fully support and encourage the removal of the car body levee as a base action for the proposed Skokomish ecosystem restoration. Due to the current lack of information regarding potential soil/water/sediment contamination from the 1950s-era cars used to construct the car body levee and the fact that this has been frequently inundated in recent decades, we have no basis upon which to register a high level of concern for residual contamination. However, when the Corps conducts sampling this summer, we offer the following recommendations:

Recommendations:

- Research the types of contaminants typically found in junk yards beneath car storage areas and test for those components. This should include metals, petroleum products, and antifreeze.
- Test the soil and sediments both upstream and downstream of the car body mass. If there is no detection upstream, use the results as a control or background sample. Then test beneath and downstream of the car bodies for the same suite of analytes.
- Report any contamination encountered to the Washington Department of Ecology hotline. For further information, contact Kris Grinnell at Ecology at 360-407-7382.